

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Raymond Wray, individually and as class representative of others similarly situated,

Plaintiff,

v.

CitiMortgage, Inc.,

Defendant.

Civil Action No.: 3:12-3628-CMC

MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT, ATTORNEYS FEES, EXPENSES, AND COSTS, AND INCENTIVE AWARD

Plaintiff Raymond Wray (“Wray”) individually and as class representative of others similarly situated, respectfully moves pursuant to Rule 23 of the Federal Rules of Civil Procedure for final approval of the Wray Agreement consummated by Wray and Defendant CitiMortgage, Inc. (“CitiMortgage”) and preliminarily approved by the Court on March 6, 2015. Dkt. No. 200. Since then, the parties have been performing in accordance with the Wray Agreement and Class Members have received Class Notice notifying them of their rights in this action.

Wray now moves the Court for (1) final approval of the Wray Agreement; (2) final certification of a Settlement Class; (3) approval of Class Counsel’s motion for attorneys’ fees, expenses, and costs and an incentive award for Wray (see Dkt. No. 199); and (4) entry of an order of final approval and judgment of dismissal.

As explained more fully in the contemporaneously filed memorandum, the relief sought here should be granted because, in addition to those arguments already submitted (see Dkt. Nos. 195-1 & 199-1), the class notice procedures here comport with due process. Additionally, Class Members’ overwhelming decision to participate in the Wray Agreement is strong evidence that Class Members believe this settlement to be a fair, reasonable, and adequate resolution of their

claims in this action. Accordingly, Wray respectfully requests that the Court grant this motion and order the relief sought here.

Respectfully submitted,

/s/Richard A. Harpootlian

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June 24, 2015
Columbia, South Carolina.